UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

LASERDYNAMICS USA, LLC,

Plaintiff,

v.-

CINRAM GROUP, INC.,

Defendant.

Civil Action No. 15-cv-01629 (RWS) (DCF)

DEFENDANT CINRAM GROUP, INC'S NOTICE OF MOTION AND MOTION TO DISMISS THE COMPLAINT PURSUANT TO FED.R.CIV.P. 12(b)(6), OR IN THE ALTERNATIVE, FOR A MORE DEFINITE STATEMENT PURSUANT TO FED.R.CIV.P. 12(e)

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendant Cinram Group, Inc.'s Motion to Dismiss the Complaint Pursuant To Fed.R.Civ.P. 12(b)(6), or in the Alternative, for a More Definite Statement Pursuant to Fed.R.Civ.P. 12(e) ("Motion"), and all papers and pleadings previously filed herein, Defendant Cinram Group, Inc. ("Defendant"), by its undersigned counsel, will move this Court, on August 19, 2015 at 12:00 PM, or as soon as counsel may be heard, at the United States Courthouse located at 500 Pearl Street, New York, NY 10007 before the Honorable Robert W. Sweet, United State District Judge, for an Order granting Defendant's Motion, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Date: July 14, 2015 COOPER & DUNHAM LLP

By: /s Tonia A. Sayour/

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Attorneys for Defendant Cinram Group, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of July, 2015, the foregoing **DEFENDANT CINRAM GROUP, INC.'S NOTICE OF MOTION AND MOTION TO DISMISS THE COMPLAINT PURSUANT TO FED.R.CIV.P. 12(b)(6), OR IN THE ALTERNATIVE, FOR A MORE DEFINITE STATEMENT PURSUANT TO FED.R.CIV.P. 12(e)** was filed using the CM/ECF system and served by email, upon counsel of record for the interested parties, as identified below. Notice of this filing will be sent to the following counsel of record for the interested parties by operation of the Court's electronic filing system:

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> <u>/s Tonia A. Sayour /</u> Tonia A. Sayour